

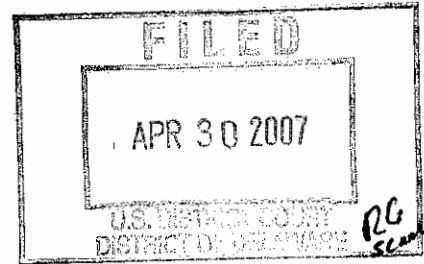
IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF DELAWARE

Michael Lee Rose  
Plaintiff

Civil Action no. 06-370-JJF

v.

First Correctional  
Medical Correctional Medical Services  
Dr. Niaz, Et-al  
Defendants



TRIAL BY JURY OF TWELVE DEMANDED

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANTS

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Defendants

Pursuant to Rule 33 of The Federal Rules of Civil Procedure and Order of this court Plaintiff Michael Lee Rose. Here by requests that Defendants answer to the following interrogatories under oath, in accordance with the definitions and instructions set forth below within thirty (30) calendar days after service of these interrogatories.

DEFINITIONS AND INSTRUCTIONS

(a) As used herein, term "document" means every type of recorded information dated or prepared prior to or subsequent to this action, including but not limited to any memorandum, note, report, letter, correspondence, message, record, minutes, work sheet, draft, instruction, work assignment, internal communication, order, and any other written, recorded, electronic, or graphic material however produced and in the absence of the original a copy thereof and any copy bearing markings not present on the original or other copy thereof.

(b) The word "incident" includes the circumstances and events surrounding the alleged denial of medical treatment to Plaintiff and other occurrences giving rise to this action.

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANTS

INTERROGATORIES

1. Was I diagnosed with Hepatitis C?
2. Do I now have Cirrhosis of the liver?
3. Why have I not received treatment yet?
4. Is this disease fatal?
5. Was I in St. Francis and or Kent General Hospital in September 2005, and for what?
6. How long did I stay at St. Francis and Kent General Hospital and for what in September 2005?
7. Why did the prison Medical Grievance Board state that to give me medical treatment would be a waster of tax payers money?
8. Did I almost die while I was at St. Francis Hospital and before I was taken there?
9. While at Kent General Hospital I was taken when the <sup>Doctors</sup> stated I was not ready yet back to the prison infirmary; I laid in bed and could not walk my body was filled with fluid only to be taken to St. Francis five (5) days later. Who was the (person) that had me removed from Kent General Hospital?
10. On March 10<sup>th</sup>, 2007; (3/10/2007) why did Dr. McDonnal state to treat me now would kill me?
11. Identify any and all documents relating to the prison medical center admission policies and procedures.
12. Identify any and all documents relating to the prison medical procedures on Hepatitis C and Cirrhosis of the liver.
13. How long was I given to live by Dr. Niaz?
14. Why did Dr. Niaz state I was too far gone to treat my lungs and anything else regarding my body and or health?

Date Submitted: 4/25/07

Respectfully Submitted

A handwritten signature in black ink, appearing to read "Michael Lee Rose", written over a horizontal line.

Michael Lee Rose

SBI#

1181 Paddock Road

Smyrna, DE 19977

## Certificate of Service

I, Michael Lee Rose, hereby certify that I have served a true

And correct cop(ies) of the attached: Motion for Interrogatories

\_\_\_\_\_ upon the following  
parties/person (s):

TO: United States District Court for the

District of Delaware

844 North King St., Lockbox 18

Wilmington, DE 19801-3570

TO: Dana Spring Monzo Daniel L. McKenty

McCullough & McKenty P.A.

1225 N. King St, Suite 100, P.O. Box 397

Wilmington, DE 19899-0397

TO: Kevin Connors, Lorenza A. Wolhar Marshall

Dennehey, Warner, Coleman Goggin

1220 N. Market St., 5th Flr., P.O. Box 8888

Wilmington, DE 19899-8888

TO: Lorenza A. Wolhar Marshall, Dennehey,

Warner, Coleman & Goggin

1220 North Market St., 5th Flr., P.O. Box 8888

Wilmington, DE 19899-8888

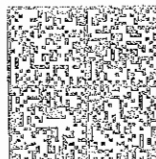
BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 25 day of April, 2007

Michael Lee Rose

IM Michael Lee Rose  
SBI# 0917800 UNIT T.2-38  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977

U.S.M.S.  
X-RAY



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United States District Court  
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Wilm Del  
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